## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

United States District Court Southern District of Texas FILED

JAN 1 8 2012

UNITED STATES OF AMERICA

V. 

CHARLES CANNON
MICHAEL MCLAUGHLIN
BRIAN KERSTETTER
JOSEPH STAGGS

CRIMINAL NO.

1 2 CR 0 2 5

## **INDICTMENT**

COUNT ONE (18 U.S.C. § 249)

On or about August 13, 2011, in the Southern District of Texas, defendants

## CHARLES CANNON, MICHAEL MCLAUGHLIN,

## **BRIAN KERSTETTER, AND JOSEPH STAGGS**

while aiding and abetting each other, willfully caused bodily injury to Y.J., who is African American, because of his actual or perceived race, color, and national origin.

In violation of Title 18, United States Code, Section 249.

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

FOR PERSON OF THE GRAND JURY

THOMAS E. PEREZ Assistant Attorney General Civil Rights Division U.S. Department of Justice

SABED A. MODY Trial Attorney

U.S. Department of Justice